

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

DOUGLAS HANDSHOE

PLAINTIFF

VERSUS

CIVIL ACTION NO: 1:13CV254 HSO-RHW

JOHN DOE(S) AKA “RANDALL CAJUN”

DEFENDANTS

MOTION FOR TIME TO REPLY TO MOTION TO REMAND

COME NOW Defendants, Charles Leary (“Leary”) and Vaughan Perret (Perret”), and file this their Motion for Time to reply to Motion to Remand filed by Plaintiff, Douglas Handshoe, and in support would show that show that Perret and Leary’s reply is due September 6, 2013. The Court entered its Order [Docket No. 14] which stays these proceedings except for remand related discovery pending the decision of Plaintiff’s Motion to Remand.

Accordingly, Leary and Perret move for forty-five (45) days time from September 6, 2013 in which to conduct remand related discovery.

RESPECTFULLY SUBMITTED this the 29th day of August, 2013.

CHARLES LEARY and VAUGHAN
PERRET

By: s/ Henry Laird
Henry Laird, MS Bar No. 1774

CERTIFICATE OF SERVICE

I, Henry Laird, of the law firm of Jones Walker LLP do hereby certify that I have sent a true and correct copy of the foregoing Motion to Dismiss by using the ECF system to the following:

Douglas Handshoe
214 Corinth Drive
Bay St. Louis, Mississippi 39520
VIA UNITED STATES MAIL AND EMAIL: earning04@gmail.com

This the 29th day of August, 2013.

s/ Henry Laird

Henry Laird

Henry Laird (MSB No. 1774)
Email: hlaird@joneswalker.com
JONES WALKER LLP
2510 14th Street, Suite 1125 (39501)
Post Office Drawer 160
Gulfport, MS 39502
Telephone: (228) 864-3094
Facsimile: (228) 864-0516